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The Honorable Michael Powell  
Federal Communications Commission  
1919 M Street NW Room 844  
Washington D.C. 20554

Dear Commissioner Powell:

Cincinnati Bell Telephone Company ("CBT") would like to take this opportunity to recommend a course of action for the Commission which will help minimize problems with Year 2000 ("Y2K") changes.

CBT has been working diligently during this past year on the Y2K changes. In conjunction with this work effort, CBT has been an active member in the Year 2000 Teleco Forum. CBT agrees with the Forum members and has concluded that the best way to limit a company's risk of Y2K problems is to adopt and implement a policy to freeze all computer software changes around the beginning of the new millennium.

Like the other major telephone companies, Cincinnati Bell Telephone is implementing a computer software code stabilization period beginning on November 1, 1999, and ending approximately on March 1, 2000. Cincinnati Bell Telephone will only implement new enhancements or releases to production systems prior to November 1. This will allow CBT to enter the year 2000 with a stable systems environment that has undergone final Y2K testing.

As the Commission conducts its work in overseeing the many communications industries, CBT strongly recommends that recognition be given to a software stabilization period. In particular, the Commission needs to be sensitive to any and all rulemakings and orders which would impact computer systems and require software changes during the stabilization period. To ensure that the industry makes the transition to the new millennium with the least risk of problems, the Commission needs to schedule and coordinate implementation requirements so they do not fall within the months in which software code is to remain unchanged. Also the Commission should, if it becomes necessary, generously grant extensions of time to allow any and all companies to adhere to a code freeze time period, and implement changes after the first quarter 2000.

It has been CBT's goal for some time to make ready, all systems for the year 2000 in order to continue, without interruption. Our normal high level of service to all our customers. The implementation of a stabilization period will help us accomplish that goal. CBT asks the Commission to help us in this effort by not requiring implementation of any changes by any of the Bureaus during the November through February software stabilization period.

Should you have any questions regarding this matter, please contact David Meier at the above address or by telephone (513) 397-1393.

Sincerely,

/s/ Eugene Baldrate,  
Vice President

c: Marsha MacBride  
Executive Director  
FCC Y2K Task Force